

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

OLIVER HOEGH, on behalf of himself and  
others similarly situated in the proposed FLSA  
Collective Action,

Plaintiff,

-against-

REBEL DAWG, INC., STACIE AMADOR,  
and DAVID YETT,

Defendants.

Case No.: 22 Civ. 00674 (KAM)(SJB)

**OFFER OF JUDGMENT TO  
OLIVER HOEGH AND EMMA  
NOBLE PURSUANT TO FRCP 68**

Defendants REBEL DAWG, INC., STACIE AMADOR, and DAVID YETT (collectively, “Defendants”), offer to allow plaintiff OLIVER HOEGH and opt-in plaintiff EMMA NOBLE (collectively, “Plaintiffs”) to take judgment against Defendants, as to all claims against Defendants in this action, for twenty-five thousand dollars and zero cents (\$25,000), inclusive of reasonable attorney’s fees and costs accrued as of this date and apportioned to the legal representation of Plaintiffs. Plaintiff’s acceptance of this offer of judgment is in full satisfaction and resolution of all claims asserted against Defendants in this action.

This offer is made pursuant to Rule 68 of the Federal Rules of Civil Procedure (“FRCP”), and evidence of this offer is not admissible except in a proceeding to enforce the judgment after the offer has been accepted. This offer is not to be construed either as an admission that Defendants are liable in this action, or that Plaintiffs have suffered any damages, but rather is made solely for the purpose of compromising a disputed claim. Plaintiffs’ acceptance of this offer of judgment will act to fully and finally release and discharge Defendants, their successors, assigns, and all past and present officers, directors, owners, employees, representatives, and agents from any and all claims and damages, including fees and costs, that were or could have been alleged or recovered

by Plaintiffs in this action, up to the date of the this offer of judgment, including, without limitation, any and all claims under the New York Labor Law and the Fair Labor Standards Act.

Plaintiffs may indicate their acceptance of this offer by signing the statement to that effect on the next page. If this offer is not accepted within fourteen (14) days after it is served, it shall be deemed withdrawn in accordance with FRCP 68(b).

Dated: New York, New York  
March 22, 2022

Respectfully Submitted,

GORDON REES SCULLY  
MANSUKHANI, LLP

By:



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*Attorneys for Plaintiffs*

**ACCEPTANCE OF OFFER OF JUDGMENT**

Plaintiffs Oliver Hoegh and Emma Noble, by and through their counsel, Levin-Epstein & Associates, P.C., accept the above Offer of Judgment of defendants Rebel Dawg, Inc., Stacie Amado, and David Yett, on the terms stated in said Offer of Judgment and pursuant to Rule 68 of the Federal Rules of Civil Procedure.

Dated: New York, New York  
March 22, 2022

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: 

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